## UNITED STATE BANRUPTCY COURT FOR EASTERN DISTRICT OF MICHIGAN **SOUTHERN DIVISION**

In re:

City of Detroit Michigan

Creditors

Bankruptcy case No. 13-53846 Honorable Thomas J. Tucker

Chapter 9

CREDITORS AFFIRMATION RESPONSE REJECTION TO DEBTOR OBJECTION SEEKING TO MODIFY DISALLOW ANCE AND/OR EXPUNGE CERTAIN FILED PROOFS OF CLAIM.

I the creditor Bradford Comit Jr, duly swear depose and say: That I reject the objection response of the Debtor, the city of Detroit Objection seeking to modify, disallow and/or expunge certain filed proofs of claim for the following reasons.

- 1) The Debtor, the city of Detroit have no cause against any of the named objectors except Charles Raimi and we never agreed to disallow our claim.
- 2) That this is not a class action and therefore, the Debtor have no standing to omnibus object certain claims against the other creditors, especially when they have different reason for filing their claims under these circumstance. The debtor, the city of Detroit has not established a cause of

1

action to which the objectors named in exhibit 2 as claims, has to respond or reply to.

- 3) That the only way that the debtor, the city of Detroit can legally address or object to these objectors listed is if they filed something in the last 14 days, otherwise there objection is untimely, in accordance to the bankruptcy rules and bankruptcy regulation code.
- 4) The debtor, the city of Detroit failed to state what constitute sufficient documentation to ascertain their validity. This is ridiculous, since the debtor is the one who prepare these exhibits, if the city want more clarification they should be more specific, stating what they want and the creditors then won't have guest.
- 5) The debtor has not demonstrated the objection is in the best interest of the city. The creditors is part of the city and we object to the notion that other objection having been held before the court and alleging that any others have been overruled before the creditor has respond show beyond a doubt preconceived prejudice against the creditors in the court.
- 6) The debtor is in violation of the rules and procedures of only written on one side of the paper and both side is prohibited by the court.
- 7) The court has jurisdiction only over Charles Raimi, unless the other claimant give their consent.

- 8) The debtor failed to comply with Sections 942 and 1127(d) "All creditors entitled to vote on the Plan received proper notice of the Confirmation hearing, The debtor failed to comply with the Bankruptcy code requiring a notice to be given of the commencement of the case in according to 11 U.S.C. section 923 of the Bankruptcy code. The Bankruptcy Rule provided that the clerk, or such other person as the court may direct is to give notice Fed.R.Bankr Procedure 2002(f). The notice "must" be also published "at least once a week for three successive weeks in at least one newspaper of general circulation published within the district in which the case commenced and in such other newspaper having a general circulation among bond dealers and bondholders as the court designates, in title 11U.S.C. sect 923 of the bankruptcy code.
- 9) That most creditors and anyone of interest never received a adequate notice and hearing, which is a denial of due process of law. In the present context these principles require that a person have timely and adequate notice detailing the reasons for the notice and an effective opportunity to defend. Armstrong v. Manzo, 380 U.S. 545, 552 (1965).
- 10) The debtor has contravened 11 USC 903 that states in part (1) "municipality may not blind any creditor that does not consent to such

composition (2) a judgment entered under such a law may not blind a creditor that dose not consent to such composition. Where in the files or on paper is the consent? This Debtor's Twenty-Eight Omnibus Objection to certain claims should be dismissed.

- 11) The class that voted received a counterfeit voting ballot and was not a proper legal official form 14 ballot and fraudulent, due to the signatures were on a separate page from the voting box and could be easily manipulated and was not conducted to preserve the purity of the election process, to provided an adequate opportunity to object to any amendments and modification to the Fourth Amended Plan: (a) The people never were legally notified according to the bankruptcy rules and code regulation. The eight amendment plan was filed on May 5, 2014 and one newspaper article in all the three new papers on May 9, 2014 after the fact and is a unrecoverable violation. The rule states it must be in three different new-papers for three (3) consecutive weeks that never was done, therefore, due process and equal protection of the law violation of the Basic Civil Voting Right law and the 5th and 14th Amendment violations of the Constitution of the United States.
- 12) I object and reject the debtor's twenty-eight omnibus objection to certain claims because the material included with the voting packages has some solicitation for a "yes votes" with letters from Shirley Lightsey a re-

presentative of the retiree committee, Donald Taylor president of Detroit retiree, Police and Fire Fighters on the behalf of the board of directors and the Emergency Manager, Kevyn Orr encouraging a yes votes in violation of the Michigan Election Statute 168.485 that states the language used shall not create no prejudice for or against the issue or proposal. This clearly is violations of Basic voting right act and the Michigan Election Statute, therefore, Due process and equal protection of the law violations of the 5<sup>th</sup> and 14<sup>th</sup> Amendment of the Constitution of the United State.

- 13) This plan of adjustment to seek to modify, disallow and/or expunge certain proofs of claim with false allegation of insufficient documentation without revealing what is need to process the claim if there is information or Documentation need.
- 14) For the court to grant the debtor request to modify, disallow and/or expunge certain filed without revealing what information is need to complete the process and move forward and then made a blanket objection. This is not a one fit all claims because they are different and the omnibus objection is inappropriate and should be denied.

Sign\_<u>~</u>

Comit Bradford

5914 Frambrook

Detroit, Michigan 48224

## UNITED STATE BANRUPTCY COURT FOR EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

City of Detroit Michigan Creditors Bankruptcy case No. 13-53846 Honorable Thomas J. Tucker

Chapter 9

# CREDITORS ORDER REJECTION TO GRANT DEBTOR'S TWENTY-EIGHT OMNIBUS OBJECTION TO CERTAIN CLAIMS.

Upon review of the Objection of the debtor, City of Detroit making false allegations of insufficient documentation and refusing to state what documentation is needed to complete or to move forward to settle or process the claims

#### IT IS ORDERED that:

- 1. The Objection is overruled and/or denied.
- 2. That each of the proof of claim listed on Exhibit 2 annexed to the objection is hereby granted.
- 3. The city is authorized to take all action necessary to effectuate the relief granted pursuant to this order in accordance with the rejection.
- 4. Nothing in this Order is intended to, shall constitute or shall be deemed to constitute the Claimant and/or objector, consent pursuant to section

- 903 of the Bankruptcy Code.
- 5. The claimant/objector of the plan retains all its rights to reject, on any Other basis, to further plan of adjustment.
- 6. The claimant and objector to plan disagree totally about the modifying,
  Disallow and/or expunge certain proofs of claim.
- 7. The claimant/objector to the plan of adjustment request a legal, fair, and with proper voting ballot and no interference from the Emergency Manager, Kevyn Orr, Shirley Lightsey a representative of the retiree committee and Donald Taylor president of Detroit retiree

## UNITED STATE BANRUPTCY COURT FOR EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re: City of Detroit Michigan Creditors

Bankruptcy case No. 13-53846 Honorable Thomas J. Tucker Chapter 9

### **PROOF OF SERVICE**

PROOF OF SERVICE			
Comit Bradford 3%, being first duly sworn de	eposes		
Say that on March			
twenty-eight omnibus objection to certain claims, Upon the cor		<u>၁</u>	
parties by certified mail at the following address:	J.S. BAN MICHIG	SOIL MAD 18	
Marc N Swanson	7E 70	œ U	
Miller, Canfield, Paddock and Stone, PLC	C)	<del></del>	
150 West Jefferson, Suite 2500	<b>⊣</b>	<u>~</u>	
Detroit, Michigan 48226			
I/We hereby certify that the statements made herein are true a			
to the best of my linearly day and belief under negative of n	animur a	nd	

I/We hereby certify that the statements made herein are true and correct to the best of my knowledge and belief, under penalty of perjury and contempt of Court under the laws of the United States of America.

Sign Comit Bradford gr

Dated March, 18 2014